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February 5, 2021

**VIA ECF**

The Honorable Kevin N. Fox.  
United States District Court  
Southern District of New York  
40 Foley Square,  
New York, NY 10007

**Re: *Actava TV, Inc., et al. v. Joint Stock Company “Channel One Russia  
Worldwide” et al. (18-cv-06626)***

Dear Judge Fox:

We represent Defendant Broadcasters in this action. Pursuant to Rule 4.A.2. of the Court’s Individual Practices and Section 6 of the SDNY Electronic Case Filing Rules & Instructions we write to request a sealing order at the level of “Selected Parties” for Defendants’ forthcoming Declaration of Raymond J. Dowd in Support of Defendants’ Motion to Compel as well as the Memorandum of Law in Support of Defendants’ Motion to Compel. The Memorandum of Law and Exhibits 2, 4 and 5 to the Declaration contain information that has been designated confidential by Plaintiffs under Paragraph 2 of the May 17, 2019 Protective Order (ECF 104). Annexed to this letter motion is a proposed order.

Respectfully submitted,

/s/ Raymond J. Dowd

cc: All Counsel (via ECF)